

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PATRICE CHAMBERS, on behalf of herself and all
others similarly situated,

Plaintiff,

vs.

HSBC BANK USA, N.A.,

Defendant.

Civil Action No. 1:19-cv-10436-ER

Hon. Edgardo Ramos

**NOTICE OF HSBC BANK USA,
N.A.'S MOTION TO DISMISS**

Oral Argument Requested

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, and all pleadings and papers on file herein, defendant HSBC Bank USA, N.A. ("HSBC") shall move this Court, before the Honorable Edgardo Ramos, United States District Judge, Southern District of New York, located at 40 Foley Square, Courtroom 619, New York, New York 10007, on a date and time to be designated by the Court, for an Order, pursuant to Federal Civil Procedure Rule 12(b)(6), dismissing the Complaint of plaintiff Patrice Chambers in its entirety and with prejudice.

Dated: New York, New York
March 6, 2020

STROOCK & STROOCK & LAVAN LLP

By: /s/ James L. Bernard

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